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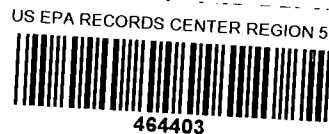
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April 4, 2001

Ms. Deena Sheppard-Johnson, S.R. 67
United States Environmental Protection Agency
Remedial Enforcement Support Section
77 West Jackson Boulevard
Chicago, Illinois 60604



Re: Chemical Recovery Systems Site
Elyria, Ohio
Response to Request for Information-Miller Studio, Inc.

Dear Ms. Sheppard-Johnson:

Please be advised that the undersigned represents Miller Studios, Inc. in regard to the Request for Information received by my client in regard to the above referenced site. Please accept the enclosed as our responses to the questions presented.

1. Identify all persons consulted in the preparation of the answers to these questions.

Mr. John Basiletti, Miller Studio, Inc.
734 Fair Avenue N.W.
New Philadelphia, Ohio 44663

2. My clients have researched their available records which are complete for a period dating back to 1994 with invoices dating back at least eight years. My clients have no information or documents or any other items which indicate potential responsibility for the Elyria site. We have been advised by Mr. Tom Nash that the EPA is in possession of one invoice allegedly from a company named "Miller Studio". This invoice of June 6, 1974, does indicate delivery of 18 drums of mask wash being sent to the Elyria site. Mr. Nash does acknowledge the existence of another Miller Studio in Millersburg, Ohio.

April 4, 2001

3. We have consulted with employees of Miller Studio and have determined that no person or employee of Miller Studio has information regarding the Elyria site.
4. The EPA identification number for Miller Studio is **OHD018227595.**
5. The acts or omissions of any person or entity other than Miller Studio, its employees, contractors and agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants and damages resulting therefrom at the Elyria site is contained in the information sent to Miller Studio, Inc. in the form of a "Notice of Potential Liability" which includes site history, questions, instructions, definitions and list of potentially responsible parties. Miller Studio, Inc. has no additional information regarding this site.
6. As stated above, there is no individual at Miller Studio, Inc. with knowledge or information about the generation, use, treatment, storage, disposal or other handling of material at or transportation of materials to the Elyria site. Again, Miller Studio, Inc. has checked all available records and has no information regarding this site. Mr. Tom Nash has advised Mr. John Basiletti of Miller Studio, Inc. that an invoice does exist purporting to represent 18 drums of mask wash sent to the Elyria site from " Miller Studio" and he acknowledges the existence of another company named Miller Studio in Millersburg, Ohio.
7. Describe all arrangements that Respondents may have or may have had with each of the following companies and persons listed as (a) through (o). Please be advised that Miller Studio has no arrangements and no information regarding any arrangements regarding any person or entity listed in (a) through (o).
8. Miller Studio has no information of generation of hazardous materials which were sent to the CRS site. However, the EPA through Mr. Tom Nash has advised Miller Studio that an invoice does exist. We do request a copy of this Invoice.

Miller Studio has no information regarding transportation of any material to the CRS site.

April 4, 2001

9. Miller Studio has no information regarding any disposal or treatment or arranged transportation for disposal or treatment of materials including but not limited to hazardous substance at the CRS site.
10. Liability insurance policies held by Respondent from 1960 to the present will be forwarded under separate cover as soon as the available documents have been collected.
11. Respondent asserts confidential information and trade secrets protection for all information requested in 11. Notwithstanding the above, we are in the process of preparing the requested information for forwarding to the EPA. The returns are filed as confidential returns and Miller Studio will attempt to redout unrelated information. The information will be forwarded as confidential and although provided under separate cover, the confidentiality shall not be waived in any regard. The EPA's request for income tax returns for the past 5 years is asserted as strictly confidential. The time period covered by the confidentiality assertion is for the entire time period sought by the EPA. Measures taken to guard against the disclosure of this information is that this information has not been disclosed to any person not legally entitled to it. No shareholder has disseminated any information contained herein. Federal income tax returns are treated as confidential records by Federal agencies. Disclosure of any information contained in tax returns or supporting documents will absolutely result in substantial harmful effects to our competitive position. Operating information such as revenues and expenses including breakdowns contained in income statements will give any competitor of Miller Studio vital information regarding profit margins, expense allowances and revenues along with relative position in the market.
12. Respondent asserts confidential information and trade secrets protection for all information requested in 12. Notwithstanding the above, we are in the process of preparing the requested information for forwarding to the EPA. The information will be forwarded as confidential and although provided under separate cover, the confidentiality shall not be waived in any regard. The EPA's request for financial records is asserted as strictly confidential. The time period covered by the confidentiality assertion is for the entire time period sought by the EPA. Measures taken to guard against the disclosure of this information is that this information has not been disclosed to any person not legally entitled to it. No shareholder has disseminated any information contained herein. Disclosure of

Page Four

April 4, 2001

any financial information contained in the requested documents will absolutely result in substantial harmful effects to my client's competitive position. Operating information such as revenues and expenses including breakdowns contained in income statements will give any competitor of Miller Studio vital information regarding profit margins, expense allowances and revenues along with relative position in the market.

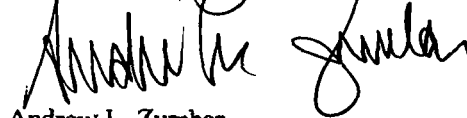
13. Respondent is not a partnership.

14. Respondent is not a trust.

Please contact the undersigned upon your receipt of the enclosed. Should you have any additional questions or concerns, the additional information referenced above will be sent under separate cover as soon as it is prepared.

Very truly yours,

LUNDGREN, GOLDTHORPE & ZUMBAR



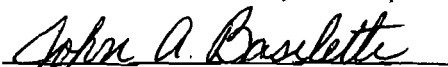
Andrew L. Zumbar
Attorney at Law

ALZ:mac

Enclosure

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage this system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations. The individual who prepared the response or the responsible corporate official acting on behalf of the corporation is John Basiletti, the undersigned.


John Basiletti

Date: 4-04-01

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TELEPHONE

330-821-2516

BROWN LUNDGREN & GOLDTHORPE

526 E MAIN ST

ALLIANCE

OH 44601 2429

DELIVERY TO

Ms Deena Sheppard-Johnson, SR 67

UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY -REMEDIATION ENFORCEMENT SUPPORT
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Chicago, IL

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Eugene Swift — A 1996 Olympian representing the United States in the 110-meter hurdles, Swift is training in the same event for the 2000 Olympic Games in Sydney, Australia. He has worked at UPS for 14 years and is currently in the human resources department in Oakland, California. He is a member of the global UPS Athlete Training Assistance Program (ATAP), which provides employee-athletes with the support they need to pursue their Olympic dreams.